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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
UNITED STATES OF AMERICA,	MOTION FOR THE RETURN OF DEFENDANT'S PASSPORT IN THE
-against-	CUSTODY OF THE UNITED STATES DISTRICT COURT PRETRIAL
LUCIA COLLADO,	SERVICES OFFICE FOR THE SOUTHERN DISTRICT OF NEW YORK
Defendant.	21 Cr. 541 (CM)

Defendant Lucia Collado, through her attorney Mark I. Cohen, moves this Court to issue an order for the return of his passport that is in the possession of the United States District Court Pretrial Services Office for the Southern District of New York.

On May 5, 2021, Ms. Collado made her initial appearance before Magistrate Judge Katharine H. Parker. She was ordered released on a \$100,000 personal recognizance bond and placed under the supervision of the Pretrial Services Agency in the United States District Court for the Southern District of New York ("Pretrial Services"). Additionally, Ms. Collado surrendered her passport to Pretrial Services.

On March 10, 2022, Ms. Collado entered into a deferred prosecution agreement with the Government that provided for a six-month term of supervision. On September 10, 2022, Ms. Collado successfully completed the pretrial diversion period. On September 20, 2022, Your Honor granted the Government's application that an order of *nolle prosequi* be filed as to Ms. Collado.

Because Ms. Collado complied with all bail orders of this court, entered into a deferred prosecution agreement, and successfully completed the pretrial diversion period, she requests that the Court order Pretrial Services to return her passport to her.

DATE FILED:

Dated: New York, New York September 21, 2022 Respectfully submitted,

Mark I. Cohen